

Richard McKnight, Esq.
Nevada Bar No. 001313
THE MCKNIGHT LAW FIRM, PLLC
528 S. Casino Center Blvd. #335
Las Vegas, Nevada 89101
rmcknight@lawlasvegas.com
Phone: 702-388-7185
Fax: 702-589-9882

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WELLS FARGO BANK, N.A., a national
banking association,

Plaintiff,

vs.

ALIREZA KAVEH, an individual; ALIREZA
KAVEH, as Trustee of the Alireza Kaveh
Family Trust; JPA INVESTMENTS, LLC, a
Nevada limited liability company, JOCELYNE
ABRAR, an individual; JOCELYNE ABRAR
as Trustee of The Jocelyne Abrar Trust; ALI
KAVEH aka Alireza Kaveh, Sr., an individual;
MOLOUK KAVEH; and MOLOUK KAVEH,
as Trustee of The Kaveh Family Trust,

Defendants.

Case No.: 2:13-cv-1472-GMN-NJK

Date:
Time:

**STIPULATION RE EXPERT REPORT AND DISCOVERY EXTENSION
(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Richard McKnight, Esq. non behalf of
Defendants, JPA Investments, LLC, Jocelyne Abrar, Jocelyne Abrar as Trustee of The
Jocelyne Abrar Trust; Ali Kaveh aka Alireza Kaveh, Sr. and Molouk Kaveh, Michael Lynch
Esq. on behalf of Plaintiff Wells Fargo and Ali Kaveh in proper person, as follows:

Excusable neglect: Excusable neglect -- Pursuant to LR 26-4, the Parties respectfully
submit that the following factors constitute excusable neglect for failing to request an
extension of the expert disclosure deadline at least 21 days prior to its expiration on January
22, 2015. This is an action against personal guarantors of a commercial loan secured by real
property. The real property securing that loan is under the control of a court-appointed

1 receiver, and was scheduled for a foreclosure sale set for February 4, 2015. During the week
2 of January 19, 2015, however, it was discovered that the February 4th foreclosure date would
3 need to be moved based upon information provided by the receiver that certain construction
4 and improvements underway at the property will not be completed until approximately the end
5 of March , 2015. Upon information and belief, the completion of this work prior to
6 foreclosure is likely to result in a higher sale price at the foreclosure sale, and that all parties
7 would benefit from a continuation of the sale date. As the new foreclosure date will affect the
8 date of value to be used in the trial of this matter, the recent discovery of the need to continue
9 the foreclosure date constitutes excusable neglect for the delay in requesting this extension.

10 Due to the fact that two of the three claims for relief in this matter are going to be
11 dismissed (see status report file herewith) and the aforementioned construction delay, the
12 parties did not apply for extension 21 days in advance of expiration of discovery.

13 Discovery remaining: Once the foreclosure is accomplished in this matter it will be
14 necessary to hire expert appraisers to determine the value of the property so that the value can
15 be contrasted with the amount claimed to be owed under the promissory note. As such:

16 Defendants' initial expert report regarding value of the property shall be due on Friday,

17 ...

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

28

May 8, 2015. Plaintiff's expert report shall be due on Monday, June 8, 2015. Defendants' rebuttal expert report shall be due Friday, June 19, 2015.

IT IS SO STIPULATED.

IT IS SO STIPULATED.

Dated this 26th day of January 2015.

Dated this 26th day of January 2015.

LYNCH LAW PRACTICE, PLLC

THE MCKNIGHT LAW FIRM, PLLC

By: /s/ Michael F. Lynch
Michael F. Lynch, Esq.
Nevada Bar No.: 8555
8275 S. Eastern Ave., Suite 200
Las Vegas, NV 89123
Attorneys for Wells Fargo Bank, N.A.

By: /s/ Richard McKnight
Richard McKnight, Esq.
Nevada Bar No.: 1313
528 S. Casino Center Blvd., #335
Las Vegas, Nevada 89101
*Attorneys for Jocelyne Abrar, Ali Kaveh,
Moluck Kaveh and JPA Investments, LLC*

IT IS SO STIPULATED.

Dated this 26th day of January 2015.

By: /s/ Alireza Kaveh
Alireza Kaveh aka Kaveh Jr.
6830 S. Rainbow, Suite 200F
Las Vegas, Nevada 89118
Pro Se

IT IS SO ORDERED

DATED this 27th day of January 2015.


UNITED STATES MAGISTRATE JUDGE